

New Local Plan – Proposed Submission (Regulation 19) version

Please return this form to the Planning Policy Team by 11:59am on Tuesday 17 December.

The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. We want to hear from people who live, work and have an interest in the borough. The Local Plan is crucial to shaping the council's approach to housing needs, the local economy, sustainability, health, inequality, and protecting the suburban character of our Borough. We encourage everyone to have their say on the issues that matter most.

What to consider when making a representation

Key points to consider when commenting during a Regulation 19 consultation:

Legal Compliance: You should consider whether the plan adheres to all legal requirements and complies with planning regulations. This includes checking whether proper procedures have been followed in the development of the plan.

Positively Prepared: Is the plan justified (including based on proportionate evidence), effective, deliverable, and consistent with national policy?

Soundness: The plan should be reasonable, realistic, and based on solid evidence, as well as consistent with national policy like the NPPF. It should be well-justified, deliverable, and in line with national planning policies.

Duty to Cooperate: Has Harrow Council has effectively engaged and worked with neighbouring councils and relevant statutory bodies to address cross-boundary planning issues?

Privacy notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the consultation database. If added to the database, you can be removed upon request.

This data is collected, collated, and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation. Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential. Further details harrow.gov.uk/newlocalplan.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

In relation to Policy CN3 F in relation to Basements, Thames Water's main concerns with regard to subterranean development are:



1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.

2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section

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Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e.

a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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4.(2) Sound	Yes	X	No
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No

Please tick as appropriate

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With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

In this regard we support Policy CN4 Part A & C & D b.

In relation to Policy CN4 Part B, although we are not the water undertaker for Harrow, we support water efficiency measures.

The Environment Agency has designated the Thames Water region to be an area of “serious water stress” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the enhanced mains water consumption target of 100 litres per head per day and support the inclusion of this requirement in Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the enhanced water efficiency standards of 110 litres per person per day referred to in the NPPG is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

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Yes	<input type="text"/>	No	<input type="text"/>
Yes	<input type="text"/>	No	X
Yes	<input type="text"/>	No	<input type="text"/>

4.(2) Sound

4.(3) Complies with the Duty to co-operate

Please tick as appropriate

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The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers

work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

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Include reference to specific concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.

(Continue on a separate sheet /expand box if necessary)

Site ID	Site Name	STW Catchment	Network RAG Assessment	STW RAG Assessment
24167	Kodak, Headstone Drive, Wealdstone, Harrow, BLOCK G(PHASE 2B) (Approved - 10/12/18)	Mogden		
78135	Site GB1 – Royal National Orthopaedic Hospital (RNOH) (LP)	Mogden		
78137	Site GB2 – Watling Farm(LP)	Mogden		
78138	Site O1 – Waitrose South Harrow (LP)	Mogden		
78149	Site O10 – Harrow View Telephone Exchange (LP)	Mogden		
78151	Site O11 – North Harrow Methodist Church (LP)	Mogden		
78154	Site O12 – Hatch End Telephone Exchange (LP)	Mogden		
78155	Site O13 – Harrow Arts Centre (LP)	Mogden	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	
78156	Site O14 – Vernon Lodge (LP)	Mogden		
78157	Site O15 – Belmont Clinic (LP)	Mogden	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	
78158	Site O16 – Travellers Rest, Kenton Road (LP)	Mogden		
78159	Site O17 – Kenton Road Telephone Exchange (LP)	Mogden	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	
33493	Site O18 – Wolstenholme (LP)	Mogden		
78160	Site O19 – Marsh Lane Gas Holders (LP)	Mogden		
78140	Site O2 – Roxeth Library & Clinic (LP)	Mogden		
78162	Site O20 – Canons Park Station Carpark (LP)	Mogden		
78163	Site O21 – Anmer Lodge (LP)	Mogden		
78164	Site O22 – Stanmore Station Carpark (LP)	Mogden		
78141	Site O3 – Northolt Road Nursery and Carpark at rear of 27 Northolt Road (LP)	Mogden		
78142	Site O4 – Grange Farm (LP)	Mogden		
78143	Site O5 – Harrow School Estate & John Lyon School (LP)	Mogden	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	
78145	Site O6 – Brethrens' Meeting Hall, The Ridgeway (LP)	Mogden	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	
78146	Site O7 – Rayners Lane Station Carpark (LP)	Mogden		
78147	Site O8 – Harrow West Conservative Association (LP)	Mogden		
78148	Site O9 – Pinner Telephone Exchange (LP)	Mogden		
78115	Site OA1 – Queen's House Carpark (LP)	Mogden		
78131	Site OA10 – Wealdstone Probation Office (LP)	Mogden		
31585	Site OA11 – Carpark Ellen Webb Drive (LP)	Mogden		
31583	Site OA12 – Peel Road (LP)	Mogden		
78132	Site OA13 – Travis Perkins Wealdstone (LP)	Mogden		
72067	Site OA14 – Byron Quarter (LP)	Mogden		

78133	Site OA15 – Iceland Wealdstone	Mogden		
77306	Site OA17 – Former Kodak Administration Offices (LP)	Mogden		
78116	Site OA2 – Harrow on the Hill Underground and Bus Stations (LP)	Mogden		
78122	Site OA3 – 15-29 College Road (LP)	Mogden		
78124	Site OA4 – Havelock Place (LP)	Mogden		
78125	Site OA5 – Station Road East, Harrow (LP)	Mogden		
78126	Site OA6 – Greenhill Way (LP)	Mogden		
78130	Site OA8 – Former Royal Mail Postal Delivery Office, Elmgrove Road (LP)	Mogden		
77797	Site OA9 – Poet's Corner & Milton Road (LP)	Mogden		
28074	Tesco, TESCO SUPERSTORE STATION ROAD HARROW HA1 2TU (LP)	Mogden		

This assessment is based on the information provided and correct as of the date the assessment was carried out (December 2024)

Network Assessment

On the information provided we do not envisage infrastructure concerns in relation to this development/s

On the information provided modelling may be required to understand the impact of development
On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary

STW Assessment

On the information provided we do not envisage infrastructure concerns in relation to the capacity at the STW

We are aware of capacity concerns at the STW and a scheme is planned to accommodate future growth
There are concerns about the capacity at the STW to accommodate future growth

The following assumptions have been made:

- The connection will be made to the closest and largest foul water or combined sewer via gravity.
- All surface water will be disposed of at source as per the drainage hierarchy. Should surface water require a connection to the public network, further assessment will be required.
- Thames Water have only assessed the existing water and wastewater network and its capacity to serve the proposed development.

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Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes <input type="text"/>	No	<input checked="" type="text" value="X"/>
4.(3) Complies with the Duty to co-operate	Yes <input type="text"/>	No	<input type="text"/>

Please tick as appropriate

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Wastewater/Sewerage infrastructure – Policy Omission

Thames Water are the statutory sewerage undertaker for Harrow, but not the water supply undertaker.

We support the references to our Drainage and Wastewater Management Plan at paragraph 8.4.6, but consider that there needs to be a separate policy covering wastewater/sewerage [and water supply] infrastructure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater [and water supply] treatment infrastructure.

Both water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.



A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable*

development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the

development needs of their area; align growth and infrastructure; improve the environment;

mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*”

Paragraph 26 of the revised NPPF goes on to state: “*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....*”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “*Adequate water and wastewater infrastructure is needed to support sustainable development*” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the

development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here <https://developers.thameswater.co.uk/New-connection-charging>

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply and network infrastructure both on and off site;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

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modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of both water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy:

PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:

“Where appropriate, planning permission for developments which result in the need for

off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and

wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.

Hence, a further text should be added to Policy as follows:

“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact or that any such adverse impact is minimised.”